

***RESOURCE MANAGEMENT PLAN AMENDMENT  
AND  
ENVIRONMENTAL ASSESSMENT  
FOR BLACK-FOOTED FERRET REINTRODUCTION  
LITTLE SNAKE RESOURCE AREA, COLORADO***

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## I. PROPOSED ACTION

Under provisions of NEPA, the United States Fish and Wildlife Service (FWS), Bureau of Land Management (BLM), and Colorado Division of Wildlife (CDOW) jointly propose the reintroduction of black-footed ferrets as a nonessential experimental population into the Little Snake Black-Footed Ferret Management Area (Management Area) that is within the Northwest Colorado Experimental Population Area. The proposed reintroduction will require the changing of the legal status of the black-footed ferret from an endangered to an experimental designation within the defined experimental population area as allowed under Section 10(j) of the Endangered Species Act (ESA). Nonessential experimental designation essentially removes the extremely restrictive regulations of the ESA and allows current uses of the public land to continue without limitation.

The proposed reintroduction is a management action that was not addressed in the Little Snake Resource Management Plan (LSRMP). Therefore, this document will serve as the amendment to the LSRMP and analyze the impacts of the proposed decision to reintroduce the black-footed ferret.

## II. PURPOSE AND NEED

A. Purpose: The immediate purpose of the proposed action is:

1. to use experimental reintroduction techniques to establish a free ranging cooperatively managed wild population of black-footed ferrets in the Little Snake Black-Footed Ferret Management Area. This release would facilitate in achieving the goals of the national black-footed ferret recovery plan and assist in research of techniques for releasing ferrets.
2. to participate in the national recovery effort for the endangered black-footed ferret, which entails establishing ten (10) or more wild populations throughout the species' historic range by 2010 in order to downlist the species to threatened status and;
3. to amend the Little Snake Resource Management Plan (LSRMP) and add a management action that was not previously addressed. This document will amend the LSRMP by analyzing any impacts to affected resources from reintroduction of the black-footed ferret.

B. Need: The black-footed ferret is an endangered species that may be extinct in the wild. The Endangered Species Act of 1973, as amended (ESA), urges Federal agencies to take action to recover endangered species. Specifically, "It . . . is the policy of Congress that all Federal departments and agencies shall seek to conserve endangered and threatened species . . ." (Section 2(c)), with the term "conserve" meaning to recover the species, i.e., ". . . to use . . . all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided in this Act are no longer necessary" (Section 3(3)).

C. Background:

1. General: The black-footed ferret was listed as an endangered species in 1967. The last known wild population near Meeteetsee, Wyoming, was devastated by canine distemper in 1985-1986. Eighteen surviving black-footed ferrets were taken into captivity in 1986-1987 to prevent extinction and to serve as founder animals in a captive propagation program at the Wyoming Game and

Fish Sybille Wildlife Research and Conservation Center aimed at eventually reintroducing the species into suitable habitat in the wild.

In 1988, the existing Black-Footed Ferret Recovery Plan (1978) was revised to provide a more up-to-date blueprint for actions to recover the species. The species' recovery goal was updated as follows:

"To ensure immediate survival of the black-footed ferret by:

- a. Increasing the captive population of black-footed ferrets to a census size of 200 breeding adults by 1991;
- b. Establishing a pre-breeding census population of 1,500 free-ranging black-footed ferret breeding adults in 10 or more populations, with no fewer than 30 breeding adults in any population by the year 2010; and
- c. Encouraging the widest possible distribution of reintroduced black-footed ferret populations."

The black-footed ferret will be downlisted from endangered to threatened status if this goal is achieved (provided the extinction rate of established subpopulations remains at or below the rate that new subpopulations are established, for at least 5 years).

## 2. Experimental Population Area

The experimental population area is proposed for portions of both Colorado and Wyoming (Figure 1). Colorado boundary is defined as those portions of Moffat and Rio Blanco Counties west of Colorado State Highway 13, west and north to the Utah and Wyoming State Lines. The Wyoming boundary is defined as that portion of Sweetwater County within Townships 12, 13 and 14 North and Ranges 97, 98, 99, 100, 101 and 102 West. This area encompasses approximately 1,220,000 hectares (3,015,000 acres). All marked ferrets found in the wild within these boundaries following the first release will comprise the nonessential experimental population. During and after the first breeding season following the first release, all ferrets found in the wild in the experimental population area will comprise the nonessential experimental population.

The primary recovery area within the experimental population area will be the Little Snake Black-Footed Ferret Management Area (Management Area). Other recovery areas are being proposed within the experimental population area by the Draft White River Resource Management Plan, which is in preparation. Until these areas are approved, efforts to maintain ferret and prairie dog populations and cooperatively manage human activities will focus on the Management Area. The prairie dogs outside of these recovery areas would not be managed for ferret recovery but would be maintained as habitat for dispersing ferrets.

The best ferret habitat is in the Management Area, therefore, ferrets would most likely concentrate and reproduce in this area, and would probably not establish populations in the rest of the experimental population area. In the unlikely event that a ferret is found on private land outside the Management Area but within the experimental population area, the landowner would be consulted and the ferret relocated if requested. The same option would be

offered to public land managers (BLM, FWS, NPS) outside the Management Area and within the experimental population area.

If ferrets reproduce successfully in the Management Area and begin to expand beyond its boundaries into marginal ferret habitat, it is likely that these dispersers will be live-trapped and used to start up or supplement reintroduction efforts elsewhere. Ferrets would essentially remain confined to the Management Area because it is the best habitat available. Ferrets found outside the Management Area would be relocated back to the best habitat within the Management Area. For this reason, the environmental assessment will focus on impacts to the environment within the Management Area.

### 3. Management Area

The Little Snake Management Area is located in Moffat County, Colorado (Figure 2) and is bounded on the north by the Colorado - Wyoming state line, on the south by Colorado State Highway 318 and the dividing line between Township 7 North and 8 North, on the east by the dividing line between Range 95 West and 96 West, and on the west by the dividing line between Township 102 West and 103 West. The area includes 221,520 hectares (547,360 acres) of public land, 18,714 hectares (46,690 acres) of state land, 11,214 hectares (27,710 acres) of private land, and 259 hectares (640 acres) of Colorado Division of Wildlife property for a total of 251,885 hectares (622,400 acres). BLM public land represents 88% of the Management Area, 8% is state land, and 4% is private land.

The Management Area boundary was developed based on the following criteria: 1) It encompasses prairie dog acreage in the complex mapped in 1989 using the "7 KM Rule" (Biggins et al. 1991); 2) It encompasses areas adjacent to the mapped complex that may add to the complex; 3) It respects state boundaries; and 4) The boundary follows township lines. The majority of the land area within the boundary is actual or potential prairie dog habitat. Major exceptions are the town of Maybell, Powder Wash and Hiawatha oil and gas facilities, Powder Wash Oil Camp, and prominent landscape features such as Sevenmile Ridge, Vermillion Bluffs, and Cold Spring Mountain. Elevations range from around 1800 meters (5940 feet) to approximately 2600 meters (8600 feet) on Cold Spring Mountain.

The major drainages in the Management Area are Little Snake River, Sand Wash, and Vermillion Creek. Notable landform features are Sevenmile Ridge, Sand Wash Basin, Dry Mountain, Vermillion Bluffs, Irish Canyon, Cold Spring Mountain, and Diamond Peak.

Significant oil and gas field developments are found in the northern portions of the Management Area. The two primary fields are Hiawatha and Powder Wash which both have a high density of active wells.

Under the existing Little Snake Resource Management Plan, the resource area was divided into 17 geographic areas called management units. Each management unit was assigned a number for descriptive purposes and has specific management objectives and prescriptions that guide land use management within that geographic area. The Management Area contains all or part of management units 2, 3, 5, 7, 9, 12, 13A, 13B, 14, and 16. Please refer to Little Snake Resource Management Plan and Record of Decision (1989) for locations, descriptions, and management objectives of each management unit.

4. Planning Process: The following steps outline the process involved in planning for black-footed ferret reintroduction.
  - a. Notice of Intent to reintroduce BFF and amend the Little Snake RMP. This step was initiated by public notices and included open houses to inform the public of our intentions.
  - b. Establishment of Work Group. The Little Snake Black-Footed Ferret Work Group (Work Group) was formed to ensure that all potentially effected publics were involved in the decision making process. Work Group members included local ranchers, energy industry representatives, and state and federal agencies.
  - c. Preparation of Little Snake Black-Footed Ferret Management Plan. A cooperative management plan for reintroduction of the ferret was prepared by FWS, BLM, and CDOW with assistance from the Work Group.
  - d. Public Scoping Meetings. Meetings were held in Craig and Denver, Colorado in August and September of 1991. The purpose of the meetings was to allow interested publics to identify issues and concerns they might have concerning black-footed ferret reintroduction. The issues and concerns identified during those meetings are discussed in below in Scoping Issues and Concerns.
  - e. Draft RMP amendment preparation and Environmental Analysis. This step involved alternative formulation, impact analysis, and alternative selection based on scoping issues and concerns.
  - f. Public review and comment. The public will be given 30 days to review the documents and provide comments. These comments will be analyzed and substantive comments will be incorporated into the document. Public meetings may be held if deemed necessary. Concurrently with public review is the Governors review which lasts 60 days and includes comments from various state agencies.
  - g. Decision Record/Notice. When all comments have been answered to satisfaction and final document prepared, the Decision Record will be issued.
  - h. Protests. The public has 30 days after issuance of the Decision Record to file protests against the proposed action.
  - i. Implementation. Once all protests have been resolved the proposed action can be implemented.
  - j. Proposed Rulemaking. This step is completed by the FWS and involves preparing a Federal Register Notice that notifies the public that the reintroduced population of ferrets are nonessential experimental. This process is ongoing during the above BLM planning process.
5. Scoping: Issues and Concerns: The following issues/concerns surfaced during interviews with interested publics during the scoping process initiated on August 27, 1991.
  - a. Land uses on public land:

- \* Permittees and other users of public lands in the Management Area were concerned that restrictive policies would be applied to public lands in the area in order to protect reintroduced ferrets. They would oppose ferret reintroduction if the public lands were managed for a single use (ferrets) as opposed to the multiple uses (grazing, recreation, minerals, etc.) for which the lands are currently being managed.
- \* Energy development companies (oil, gas, coal) have expressed concern that reintroduction could restrict exploration, development and maintenance operations in the Management Area.
- \* Some companies have asked how search protocol for black-footed ferrets on public lands would be affected by reintroduction of the black-footed ferret. Other companies asked whether they would be protected from unreasonable studies or having to pay for such studies.
- \* Recreational users expressed support of reintroduction. OHV user groups felt that their use would have little conflict with ferrets because they are nocturnal.
- \* Several individuals would like to see a total prohibition of sport hunting of prairie dogs and all sport trapping within Management Area.

b. Land uses on private land:

- \* Private landowners and users were concerned about "taking" of private lands and that their rights would be threatened, such as ability to control prairie dogs or carry out their normal day to day operations.
- \* Several individuals wanted to know what would happen if ferrets leave the experimental population area and if there will be a plan to deal with this possibility.

c. Miscellaneous questions and comments:

- \* Several interested individuals and groups expressed concern that the nonessential experimental designation was not restrictive enough to protect the reintroduced animals.
- \* Will predator control be allowed to continue?
- \* Would standards for concluding jeopardy as defined by the ESA be relaxed as a result of the reintroduction?
- \* Would there be any economic benefits?
- \* Need to discuss nonessential experimental versus essential versus endangered and determine which one is appropriate for Little Snake.
- \* Define difference between release site and experimental population area and activities that will be allowed.

### III. ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This chapter describes the No Action alternative, the Proposed Action alternative, and alternatives that were considered but not studied in detail. The No Action alternative and the Proposed Action alternative are evaluated in detail. The other alternatives considered, but not studied in detail, are presented and the reasons for their having been eliminated from detailed study are discussed.

#### A. No Action (Continuation of Current Management Direction)

Under this alternative, black-footed ferrets would not be reintroduced into the Management Area, and the Management Plan would not be implemented. Intensive monitoring of prairie dog populations would not occur, as is being conducted currently in preparation for reintroduction. Predator control activities would not occur except for those activities normally carried out by the Animal Plant Health Inspection Service (APHIS) on private and public lands.

The FWS would not prepare and issue a rulemaking to designate a nonessential experimental population of ferrets in the portions of Moffat and Rio Blanco counties. Federal Agencies would still be required to consult with the FWS under Section 7(a)(2) of the Endangered Species Act when surface disturbance or other activities were proposed that may affect ferrets potentially occurring in the prairie dog towns within the area. Formal consultations by Federal agencies with the FWS normally require a survey to determine the presence or absence of black-footed ferrets utilizing guidelines developed by the FWS (1989). These surveys are conducted only between December 1 and March 31 (diurnal survey) or between July 1 and October 31 (nocturnal survey) and must be conducted no more than one year prior to the initiation of the project. If no black-footed ferrets or their sign are found as a result of these surveys, a "no effect" black-footed ferret determination is made. If black-footed ferrets or their sign are found as a result of these surveys, the FWS would have to determine whether the proposed action is likely to jeopardize the ferrets through consultation procedures established in ESA. If a jeopardy determination is made, then modification or, if necessary, cancellation of the proposed action would be required while further studies are conducted on the newly discovered black-footed ferret population.

**B. Proposed Action (Nonessential Experimental Population)**

Under this alternative, the FWS and the CDOW would reintroduce captive-raised black-footed ferrets. Releases would be conducted under the conditions described in the FWS rulemaking to designate the released population nonessential experimental (to be issued in 1996) and in "A Cooperative Management Plan for Black-Footed Ferrets--Little Snake Management Area, Colorado". Thus, the proposed action is the reintroduction of captive-raised black-footed ferrets (which are excess to the objectives of the captive endangered population) which would be designated as a nonessential experimental population in accordance with Section 10(j) of the Endangered Species Act, as amended.

A summary of the major elements of the reintroduction proposal follows. Readers are advised to refer to the rule and "A Cooperative Management Plan for Black-Footed Ferrets--Little Snake Management Area, Colorado" for a more detailed description.

Provided habitat conditions are suitable and captive black-footed ferrets are available, the proposed release would consist of at least 40 black-footed ferrets (20 males and 20 females) no earlier than September 1995. To the extent possible, black-footed ferrets would be released in family or social groups established in captivity, because other reintroduction programs have found this strategy increases survival. The release method would consist of a cage and nest box arrangement similar to that used in captivity. The release cage would be placed in or near a high density prairie dog town and the black-footed ferrets would be kept in the cage and fed for a short acclimation period. If they appear to be adapting well, an artificial burrow could be opened to the outside and black-footed ferrets allowed free ingress and egress. They would be supplied food as needed, and use of the cage and pen until they adapt to life outside. Eventually, it is expected all animals would begin to hunt on their own and disperse to suitable habitat.

Releases in successive years would likely be necessary to establish a population because mortality is high on former captive animals. Monitoring of animals would be continued until dispersion and survival are well documented. Initial monitoring would include the use of radio tracking equipment to trace the activities of selected radio collared animals. In addition, spotlight and/or snowtrack monitoring would begin as soon as black-footed ferrets disperse from release pens, and would continue for several years.

The FWS and the CDOW would continue to seek advice and test alternative strategies, and would make minor adjustments in the proposed release strategy on site during the reintroduction phase of the program. If alternative techniques are not tested in the first year of releases, then they would be tested in subsequent years as deemed necessary by the FWS and the CDOW and via advisory assistance from other professionals requested to assist the agencies or providing unsolicited substantive comments or recommendations. Eventually, a reintroduction method would be developed for use at future reintroduction sites.

Presently, research is being conducted to test the effectiveness of preconditioning pens on survival rates of newly released ferrets. Preconditioning pens are simulations of actual ferret habitat including live prairie dogs. These pens can range from 100 to 2500 square feet and are completely enclosed to allow no ingress or egress by any species of wildlife. As part of the research, preconditioning pens may be constructed in the Little Snake Management Area as soon as 1995 and site specific environmental analysis would be completed at that time.

Based on current monitoring information, the preferred release sites within the Management Area would be in Subcomplex A1 or A4 (Figure 3). The specific release site will not be determined until after the 1994 monitoring information is analyzed.

Reintroduction within the Management Area would be re-evaluated if any of the following minimum criteria failed to be met:

1. Based on ferret family criteria (Biggins et al 1991), the ferret habitat rating index is 50 percent or less than the 1993 ferret family rating for the entire Management Area (48), or a strong indication that such will be the case within five years.
2. Failure of BLM and Work Group to resolve conflicts and concerns through the Management Plan and NEPA process to the point that reintroduction can proceed without significant disruption of current land use.
3. Failure to acquire "nonessential experimental population" designation for the Northwest Colorado Experimental Population Area through Federal rulemaking process.
4. Wild black-footed ferret populations are found within the Experimental Population Area prior to the first breeding season following the first reintroduction.
5. Active cases of canine distemper are diagnosed within the Management Area 12 months prior to release.
6. Fewer than 20 black-footed ferrets are available for the first release.
7. Funding is not available to implement the plan.

If minimum criteria are met, preventative and/or corrective measures may be taken to reduce predation on black-footed ferrets by coyote, red fox, badger, great horned owl, or other likely predators at release sites for a short time to allow the black-footed ferrets to become established. No long term predator control specifically for black-footed ferret protection is planned after the black-footed ferret release phase of the ferret reintroduction programs. Normal ongoing predator control programs will continue as authorized.

For mammalian predators that are potential carriers of canine distemper (coyote, red fox, and badger), at least 40 individuals of each species (if populations permit) would be removed annually from the area to monitor for the occurrence of canine distemper, a disease which is fatal to the black-footed ferret if contracted. Released black-footed ferrets would be inoculated against canine distemper if a useable vaccine is available.

The CDOW would designate the Management Area as a limited quota trapping area, requiring trappers to work closely with District Wildlife Managers (DWM) following the recommendations of the Little Snake Black-Footed Ferret Working Group. DWMs would instruct trappers on techniques and locations that would avoid incidental take of black-footed ferrets. In prairie dog towns, the use of leghold traps with increased tension and snares equipped with a stop to preclude a black-footed ferret being captured and/or snared would be required. DWMs would

also inform trappers of opportunities to provide data relevant to monitoring diseases.

If the Management Area ferret population is designated a nonessential experimental population, the population is not considered essential to the continued existence of the species. The basis for the "nonessential" determination is explained in the rulemaking.

The released animals and any wild-reared offspring would be designated a nonessential experimental population. This designation would facilitate local cooperation in this reintroduction effort by easing the most prohibitive restriction in the ESA, specifically the "jeopardy" prohibition of Section 7(a)(2). Designation of the reintroduced population as a nonessential experimental population would also assure landowners and public land permittees that there would be no designation of critical habitat within the experimental population area - - a designation that may be perceived as restricting land management prerogatives. The designation of the reintroduced population as a nonessential experimental population, combined with commitments contained in the rule and the Management Plan would assure affected Federal agencies, State and local governments, and private landowners that they would retain their flexibility to exercise their land management options, though mindful of impacts to ferrets and ferret habitat. The CDOW, BLM and FWS do not envision that it will ever become necessary to consider modifying the nonessential experimental designation for this population unless the experiment is determined to be a failure or until the species is determined to be recovered. Failure of the experiment would result in rescinding any designation for the area and if the species is recovered, it would be taken off the list of endangered species.

Designation of the reintroduced population as a nonessential experimental population would eliminate the requirement for traditional Section 7(a)(2) consultation regarding black-footed ferrets in the experimental population area for all Federally authorized, funded, or conducted surface disturbance actions. Instead, ferrets in the Management Area would be treated as though they were a species proposed for listing, and Federal agencies would be required to confer with the FWS only on agency actions likely to jeopardize this population as discussed in Section 7(a)(4) of the ESA. The determination of "likely to jeopardize" would be made by the Federal Agency in consultation with the work group. The recommendations made by the FWS during conference would be advisory in nature.

In addition, individual ferrets of the reintroduced population would be treated as though they were threatened species with regard to "take". A special regulation has been written to allow "take" under prescribed circumstances. Incidental "take" would not be prosecuted, whereas knowing and willful take would be prosecuted. Incidental "take" is addressed in the rule and in the Section 7 consultation conducted on the proposed reintroduction. Incidental "take" will be monitored and action will be taken to ensure that such take is minimized, to the extent possible.

The Management Plan was specifically designed so that black-footed ferret reintroduction and management in the Management Area would be compatible with existing uses on public and private land so that neither lifestyles nor income potential are negatively affected. Ferret reintroduction would not supersede or in any way reduce the fundamental rights of private landowners to manage their property and control activities. For actions proposed on Federally managed lands, discussions would be held with the applicant to discuss opportunities to avoid or minimize potential project impacts to ferrets and prairie dogs. In addition, the

current requirement for pre-project ferret searches would be eliminated within the experimental area unless proposed and conducted by BLM, FWS or CDOW.

Grazing appears to be compatible with reintroduction efforts. On public lands, structural type range improvements would be designed and located to minimize or avoid impacts to ferrets. In addition, proper grazing management practices, especially vegetation management, would be beneficial to ferrets through better prairie dog distribution and increase prairie dog populations.

Although activities on private lands and Colorado state school lands would continue as usual, the Work Group would attempt to deal with conflicts, if significant changes in activities has the potential to impact ferrets or their habitat. If necessary, the Work Group would work with the local CRM Steering Committee for assistance in conflict resolution.

Wildlife habitat improvement projects would be allowed but modifications may be necessary on placement of project and timing of construction. For example, projects would be placed at least 1/4 mile from release cages and scheduled to avoid the period when ferrets are in cages and/or newly released.

Recreational uses that might impact ferrets (e.g., hunting, trapping, shooting of prairie dogs, and off-highway vehicle travel) would be managed to avoid or minimize impacts to ferrets. For example, reintroduction locations would be selected to avoid hunter concentration areas, and ferret releases could be timed to avoid periods of heavy hunter use of the area.

As previously discussed, the CDOW would designate the Management Area as a limited quota trapping area, requiring recreational trappers, as well professional trappers, to work closely with District Wildlife Managers (DWM) following the recommendations of the Little Snake Black-footed Ferret Working Group.

Some temporary modifications in use by off-highway vehicle (OHV) enthusiasts would be required to protect release areas and certain prairie dog towns occupied by black-footed ferrets. For example, OHV use would be closed within 1/4 mile of release cages from September 1 to December 1. When this occurs, local OHV organizations would be asked to help sign the areas and notify the general public about the limitation. OHV organizations in northwest Colorado have already expressed their interest in the reintroduction effort and are committed to full cooperation.

Powerlines on public land would comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc, 1981). Power companies would be encouraged to construct new powerlines to avoid prairie dog towns on public lands within the Management Area to preclude their use as perching sites by raptors that might prey upon black-footed ferrets.

Animal damage control activities would follow the Craig District Animal Damage Control Plan which is updated each year. When the plan is updated for the year when ferrets are to be released, a provision will be added to insure that ferrets are not caught in snares or leghold traps. This would be in the form of proper tension for leghold traps and stops for snares.

Prairie dog control within the Management Area will be restricted on public lands to insure protection of individual black-footed ferrets, and retain the optimum prey base to support the projected ferret population. As black-footed ferrets have not

been known to establish residence in Wyoming ground squirrel colonies, ferret prey thresholds for Wyoming ground squirrels have not been established within the Management Area. Any rodent control deemed appropriate within the Management Area will be reviewed to insure the proposed method will not kill or injure black-footed ferrets, or significantly impact their required prey base. Rodent control will only be conducted by individuals with a commercial applicators license issued by the Colorado State Department of Agriculture, with oversight provided by FWS, BLM, CDOW and/or Animal Damage Control personnel.

Numerous county roads transect the Management Area and are routinely maintained by the Moffat County Road Department. This maintenance occurs predominantly during daylight hours, and is confined to existing graded surfaces. Consequently, regularly scheduled road maintenance should not impact black-footed ferrets, nor significantly impact the prairie dog population. No restrictions are therefore considered necessary. Construction of new county roads or significant modification of existing roads within the Management Area would require consideration of black-footed ferret recovery goals.

Mineral activities would be relocated, if possible, at the activity planning stage, such as at APD or the permit application stage. Prairie dog towns targeted for release would be managed as No Surface Occupancy while the release cages are in place; a period of approximately 3 to 4 months. This seasonal restriction could occur annually over a period of 1 to 5 years. To facilitate coexistence between oil and gas and other mineral development, the following measures would be implemented where feasible:

- educational programs for operator's field employees
- preparation of Surface Use Plan of Operations (SUPO)
- time delays of operations up to 60 days
- relocation of operations up to 200 meters

The SUPO would assist in designing operations which would minimize impacts to prairie dogs and black-footed ferrets during and after project development. The plan would serve as a tool for developing operational stipulations so that permitting is accomplished as quickly as possible. This plan would not recommend activities that would infringe on the valid existing rights of the lease.

If, during development of the SUPO, it is determined that oil and gas or other mineral development could reach a point where significant loss of black-footed ferret habitat is unavoidable, a compensation plan would be cooperatively developed by BLM, FWS, CDOW and the company/operator. The compensation plan would include an off-site mitigation strategy for equal and in-kind replacement of disturbed or destroyed prairie dog habitat. This mitigation would be the responsibility of BLM but permittees and other cooperators would be asked to participate as much as possible. The Work Group would participate in development of each SUPO/compensation plan and determine, on a case-by-case basis, the threshold at which habitat loss would become significant for each individual oil and gas or mineral operation.

Habitat replacement, as defined here, would be actual development of new prairie dog colonies or transplanting prairie dogs into suitable abandoned towns. Transplanting has been successful in Utah for recovery efforts related to the Utah prairie dog (Jacquart et al. 1986). Briefly, the methodology involves manipulation of vegetation to increase visibility and drilling holes to simulate burrows then transplanting prairie dogs into the new habitat.

The Work Group would review all proposals and if every avenue of protection for ferrets and their habitat has been exhausted and conflicts between ferrets and oil and gas or other mineral development as well as any other authorized land use activity cannot be resolved, ferrets would be relocated.

Landowners, land managers, and land users would be informed, as appropriate, of the potential impact their land management or land use activities could have on ferrets, and through the Work Group, advised of means to reduce those impacts through cooperative measures.

If successful, the Proposed Action would result in the establishment of a free-ranging breeding population of approximately 40 black-footed ferret adults in the Management Area by a target date of 2000, while not affecting the desired lifestyle and income potential of private landowners in the Management Area.

The BLM would confer with the FWS when a proposed action would jeopardize the existence of experimental nonessential populations of BFF.

#### **D. Other Alternatives Considered But Not Studied in Detail**

1. Reintroduce black-footed ferrets into Little Snake Management Area as an endangered population. Theoretically, it would be possible to reintroduce black-footed ferrets into the Management Area as a population of endangered species, i.e., without invoking the special "experimental population" status provided as a management option by Section 10(j) of the ESA. However, the stringent protective requirements (in Section 7 and Section 9 of the ESA) that would necessarily accompany such an action, and the possibility that the reintroduction site might be designated critical habitat in the future would undoubtedly result opposition to the action from both private land owners and public and state land users and permittees. Reintroduction as an endangered population is likely to be perceived by private landowners as threatening their fundamental rights to manage their property and control activities. Public land users would feel that restrictions would be such that they would not be able to carry out their legally permitted activities. Opposition would be so great that any attempt to introduce ferrets would fail.
2. Reintroduce black-footed ferrets into Little Snake Management Area as an essential experimental population. It has been argued that establishing captive-bred black-footed ferrets in the Management Area is essential to the continued existence of the species in the wild, and therefore, that the population should be designated an essential experimental population. The final rule will explain the FWS's rationale for determining this population to be not essential to the continued existence of the species. Moreover, concern over the stringent Section 7 protective requirements that would necessarily accompany such an action and the possibility that the reintroduction site might be designated critical habitat in the future is likely to result in significant opposition to the action. Without public support, any attempt to reintroduce black-footed ferrets is unlikely to succeed.

#### **IV. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

This section describes the affected environment and evaluates the likely environmental consequences of implementing the No Action and the Proposed Action alternatives. Floodplains, wetlands, prime or unique farmlands, wilderness values, water quality, prime or sole sources of drinking water, wild and scenic rivers, Native American religious

concerns, and areas of critical environmental concern, all of which are specifically protected by Federal law or regulation, would not be affected by the alternatives and are not evaluated. In addition, the alternatives would have no significant effect on regional climate, air quality, hydrology, soils, vegetation, forest management, fisheries resources, visual resources, or on local noise levels.

The alternatives might possibly affect wildlife resources, paleontological and cultural resources, recreation, mineral resources, range and livestock management, lands and realty management, and local socioeconomic parameters.

No significant adverse cumulative impacts are identified for the proposed action.

The description of the affected environment and environmental consequences of implementing the alternatives will be restricted to the Management Area. The Management Area is the core recovery area wherein habitat management and the majority of coordination with landowners, land managers, and land users would occur. It is predicted that a self-sustaining population of BFFs would depend on the Management Area.

The area outside the Management Area but within the experimental population area boundary (for the purposes of this discussion, only that portion of the XP boundary within the Little Snake Resource Area is being considered) is essentially a buffer zone, with only isolated and scattered prairie dog populations. This habitat is considered incapable of supporting a viable population of ferrets over the long term. If a ferret were to disperse into this area, the affected landowner has the option to request its removal from private land. Moreover, even if the landowner did not request removal, but it was apparent that the ferret could not survive in the area, the ferret would be relocated the ferret to better habitat (where its survival chances were improved) or to another reintroduction site. Therefore, the reintroduction effort is unlikely to result in appreciable impacts in the buffer zone, as ferrets are unlikely to persist in this area.

In addition, under the No Action alternative, BLM would manage its lands in accordance with the standard stipulations in its Resource Management Plans and that State and private landowners would continue to manage their lands as they see fit. The No Action alternative is a "Business as Usual" scenario. The impacts of the Proposed and Delayed Action alternatives that are described will be those that are different from and/or incremental to those of the No Action alternative.

#### **A. Biological/Ecological Resources**

##### **Affected Environment:**

The reader is referred to the Draft Little Snake Resource Management Plan and Environmental Impact Statement (1986) and the Cooperative Management Plan for Black-Footed Ferrets--Little Snake Management Area, Colorado (1995) for a description of biological resources associated with the Management Area and proposed experimental population area.

##### **Environmental Consequences:**

#### **1. Threatened, Endangered, and Candidate Species**

**No Action:** Taking no action to reintroduce the black-footed ferret into the Management Area would result in no new impacts to listed species currently in the area. These species would continue to be protected through Section 7

consultation. The decision not to reintroduce black-footed ferrets into the Management Area would negatively impact the black-footed ferret recovery effort, since the opportunity to test reintroduction techniques and to reestablish a free-ranging population of black-footed ferrets would not occur. In addition, BLM would be violating its own policy by not taking action towards recovery of a listed species when habitat for that species is available.

Proposed Action: The Proposed Action would authorize reintroduction of black-footed ferrets on public lands within the Management Area. The FWS would be the lead agency in reintroduction and must satisfy requirements of NEPA and ESA prior to reintroduction including Biological Opinion, Experimental Rule, and Environmental Analysis. Documentation of that action will be attached to this EA when completed. It is anticipated that the proposed action would likely beneficially affect the black-footed ferret recovery program by establishing a population of 40 or more breeding black-footed ferrets in Colorado.

## 2. Other Wildlife

No Action: Under the existing situation, the black-footed ferret is considered an endangered species. For this reason, BLM must comply with Section 7 of the ESA and is required to complete black-footed ferret surveys according to FWS guidelines prior to any activity that has the potential to impact black-footed ferret habitat. This requirement would continue under the no action alternative.

Proposed Action: Authorizing the action reintroducing black-footed ferrets into the Management Area would result in additional predation on white-tailed prairie dogs, and add another prey species for larger predators such as the coyote, red fox, badger, and raptors. This, however, would not result in any significant impacts to the prairie dog or predator populations in the Management Area.

The Management Plan calls for managing prairie dog populations in the Management Area such that the area would maintain at least 90 percent of the 78,000 acres of prairie dogs mapped in 1989. Therefore, to the extent possible, prairie dog populations in the Management Area would be buffered against serious man-made declines. The intent is to manage prairie dogs as a dynamic unit, which would allow tradeoffs to be made, such as allowing nuisance prairie dog control in some areas and possibly compensating with prairie dog expansion in other areas, all to retain prairie dog acreage objectives for the Management Area.

Wildlife species associated with prairie dog ecosystems (e.g., burrowing owls, cottontails, and various rodents) would benefit secondarily from efforts to preserve prairie dog colonies.

Black-footed ferrets are susceptible to canine distemper which may infect native carnivores in the Management Area. In order to test for the prevalence of this disease, approximately forty individuals each of coyotes, red foxes, and badgers (if population permits) would be removed. This would not significantly reduce populations of these species in the Management Area. Population numbers would return to pre-treatment levels in less than six months post-treatment.

Managing predators immediately prior to and following the release of black-footed ferrets in the vicinity of the release sites is expected to reduce the numbers of coyotes, red foxes, badgers, and possibly great horned owls. Removal of these predators is expected to have a short term impact until the population is able to recover to previous population levels. The existing population is healthy and occurs in sufficient numbers. Due to the reduction of predators in the vicinity of the release site, a slight but insignificant increase in the rodent population could possibly occur, though this could be minimal due to the reintroduction of a new predator. Existing predator populations are expected to reach pretreatment numbers via immigration from outside the control area within 6 months after control measures are terminated, thereby returning rodent populations to pretreatment levels.

Anticipated impacts to pronghorn antelope, mule deer, and elk crucial winter habitat would be minimal because reintroduction activities would be confined to a small area and efforts to minimize human-caused stress to black-footed ferrets would concomitantly minimize stress to wintering big game.

There would be no measurable impacts expected for any other wildlife species from the black-footed ferret reintroduction.

### 3. Cultural/Paleontological Resources

No Action: No new impacts to cultural/paleontological resources would occur from black-footed ferret related activities if no action is taken to reintroduce black-footed ferrets into the area.

Proposed Action: If black-footed ferrets were reintroduced, some minor surface-disturbing activities may be undertaken to house or support black-footed ferrets during the reintroduction process. Class 3 surveys would be conducted on the specific sites where surface disturbance may occur. If necessary, the proposed surface-disturbing activity would be relocated to a site in which surveys reveal no significant cultural/ paleontological resources. Hence, no impacts to cultural/paleontological resources would result from the Proposed Action.

### 4. Recreation

No Action: Under the existing situation, the black-footed ferret is considered an endangered species. For this reason, BLM must comply with Section 7 of the ESA and its requirement to complete black-footed ferret surveys according to FWS guidelines prior to any activity that has the potential to impact black-footed ferret habitat. Recreation activities have not resulted in an impact that required compliance with the ESA. No change in this situation is expected under the no action alternative.

Proposed Action: Significant impacts to existing uses are unlikely to occur. Some temporary restrictions are anticipated to protect release areas and certain prairie dog towns occupied by black-footed ferrets. For example, OHV use will be closed within ¼ mile of release cages from September 1 to December 1. When this occurs, local OHV organizations would be asked to help sign the areas and notify the general public about the limitation. OHV organizations in northwest Colorado have already expressed their interest in the reintroduction effort and are committed to full cooperation.

The potential exists for black-footed ferrets to be caught in certain types of traps used by recreational fur trappers and animal damage control agents. A temporary closure to trapping in occupied habitat or tension adjustment requirements may be necessary to avoid accidental trapping of ferrets. Cooperation from Animal Damage Control, Animal and Plant Health Inspection Service, will be obtained.

Shooting may be restricted initially within prairie dog towns used as release sites. Restrictions would likely be lifted after ferrets either become established or disperse from the area. The impacts of shooting will be monitored to determine consequences to black-footed ferret prey.

## 5. Mineral Resources

No Action: Under the existing situation, the black-footed ferret is considered an endangered species. For this reason, BLM must comply with Section 7 of the ESA and would require industry to complete black-footed ferret surveys according to FWS guidelines prior to any activity that has the potential to impact black-footed ferret habitat. Activities are not allowed to take place until BLM and FWS are satisfied that no wild black-footed ferrets exist in the area of disturbance.

### Proposed Action:

#### OIL AND GAS

Operating costs would be reduced if operators are not required to conduct black-footed ferret surveys prior to surface disturbance. Oil and gas operations on the ground (Applications for Permit to Drill and associated pipelines, facilities and roads) could be delayed up to 60 days or relocated up to 200 meters while the release cages are out in the field. If this 60 day timing restriction falls within the first 2 months of the release period, the last 2 months would not be restricted to the operator. It was determined in the Oil and Gas Leasing EIS/RMP Amendment (1991) that restrictions of 60 days or 200 meters are not a significant impact upon the oil and gas lessee.

Full field development could result in significant impacts to ferret habitat by reducing prairie dog populations. The reader is referred to "Colorado Oil and Gas Leasing and Development--Final Environmental Impact Statement" (BLM 1991) for a description of impacts related to oil and gas field development. As discussed in the proposed action, BLM would commit to off-site mitigation in the event significant impacts to prairie dogs cannot be avoided through development of a compensation plan.

#### LEASABLE MINERALS OTHER THAN OIL AND GAS

No development of oil shale, bituminous sandstone or coal is expected in the foreseeable future. Therefore, no impacts are anticipated from reintroduction of black-footed ferrets.

#### SALABLE MINERALS

Sand and Gravel: If ferrets are not released in the particular prairie dog towns in or near current and known proposed gravel pits or decorative stone collection areas, no impacts to the current mineral development are

anticipated. Most gravel deposits that are mined in this part of the county were deposited during the Tertiary Period, approximately 40 to 50 million years ago and are now erosional remnants capping ridges and hilltops, usually with very little topsoil or overburden.

The prairie dogs tend to build their towns in the valley bottoms where the topsoil is deeper and the substrate is composed of more silty sand and clay rather than cobbles and pebbles. Therefore, little conflict is anticipated between prairie dog towns with ferret reintroduction and future sand and gravel development.

Mining operations generally cannot be relocated and one must be cognizant that mining will remove the prairie dog/ferret habitat. If a proposal for a new pit is located near one of the prairie dog towns selected for ferret release, depending on the scope of the mining plan, the operator could be required to wait until the ferrets are established (3-4 months) or select another site. Either alternative could increase operating costs due to increased haul distance from a different site to the proposed market area or cause the operator to abandon the proposed pit because of lost contracts while waiting for the ferrets to become established. The latter case would result in a loss of royalty revenue to the United States which would not likely be a significant impact to the United States. Either scenario could, however, be a significant economic impact to the operator's business.

The impact to the operator could be mitigated if the situation is handled on a "first come, first serve" basis. If there is an application for a material sale on file with BLM prior to release of ferrets into a nearby prairie dog town, the BLM will continue to process the application and approve the permit and the ferrets will be released into another prairie dog town. If the ferret release is past a "point of no return" prior to application for a material sale, the sale could be processed with stipulation that no surface occupancy be allowed during the 3 to 4 months the cages are in the field for establishment of the ferrets. This is not likely to impact more than one or two potential operators so the overall impact to the industry is not likely to be significant. This would identify requirements to protect ferrets at the earliest mine planning stage, reducing impacts to individual operators to an acceptable level.

As discussed in the proposed action, BLM would commit to off-site mitigation in the event significant impacts to prairie dogs cannot be avoided through development of a compensation plan.

**Decorative Stone:** Most collection of stone is done by hand so surface disturbance is minimal. It is also done during daylight hours so there should be no conflict with the ferrets. If the human activity would disturb the ferrets, ferrets should not be released in the community sale areas of Dugout Spring and Godiva Rim. Stone sales and collection are possible in other areas but with less frequency. If this limited human activity is undesirable, mineral material sales could be prohibited for the 3-4 month period immediately after release required for the ferrets to become established. Most users could be redirected to another community sale area, but it could result in an increase in stone removed from public lands under trespass or, for commercial sales outside community sale areas, the same impacts as for sand and gravel. Considering the relatively small market and individual sales for decorative stone, these potential impacts would not be significant.

## LOCATABLE MINERALS

If the ferrets are not released in a prairie dog town on a mining claim, it is unlikely that there would be any significant conflicts between mining claim development and ferret reintroduction. If ferrets are released on active mining claims, there may be no way to effectively mitigate the impact of mining on the ferrets.

Mining operations generally cannot be relocated and one must be cognizant that mining will remove the prairie dog/ferret habitat. A mining claimant is required by law to do assessment work on his mining claim every year. He is also expected to diligently work toward developing a mine. Once his operations fall into the Notice of Intent or Plan of Operations level, stipulations can be placed on him as long as his right to develop a mine are not infringed. If the claimant proves a valid discovery of a mineral and applies for patent, the land could be patented under the mining laws and be passed out of federal ownership.

Prior to ferret release, BLM would check for active mining claims and contact the claimants in order to try to develop an agreement to allow mining and the ferrets to coexist. If an agreement cannot be reached, BLM would commit, through a compensation plan, to equal and in kind replacement of habitat as discussed in the proposed action.

### 6. Livestock Grazing/Ranching

No Action: Under the existing situation, No change in the existing situation would occur.

Proposed Action: Livestock grazing (numbers, distribution, etc.,) would not be restricted in any way. Some range improvements, such as reservoir or windmill construction, would not be disallowed but relocation may be necessary to avoid direct conflict between management of prairie dogs and black-footed ferrets. Restrictions on range improvements may be necessary within 1/4 mile of release cages or other equipment to prevent disturbance or damage.

### 7. Rights-of-Way/Realty Actions

No Action: Under the existing situation, the black-footed ferret is considered an endangered species. For this reason, BLM must comply with Section 7 of the ESA and would require industry to complete black-footed ferret surveys according to FWS guidelines prior to any activity that has the potential to impact black-footed ferret habitat. Activities are not allowed to take place until BLM and FWS are satisfied that no wild black-footed ferrets exist in the area of disturbance.

Proposed Action: Applicants for a right-of-way on public lands would be contacted early in the right-of-way application process and encouraged to avoid prairie dog towns. Rights-of-way on public land requiring significant surface disturbance such as large pipelines or roads may be lengthened and/or rerouted to avoid prairie dog towns occupied by black-footed ferrets. These increases in length would increase construction and maintenance costs but cannot be determined until specific proposals are analyzed. In cases where projects cannot avoid prairie dog towns, the FWS and/or the BLM would determine if

ferrets occur in the area. Recommended mitigative measures would be provided to the applicant. It is believed that none of these measures would be unreasonable so as to preclude the intended activity in the Management Area. Routine maintenance activities would not be effected.

Deterrent devices designed to prevent raptors from perching on power line structures would be required to discourage predation on ferrets. This may result in slightly increased construction costs where new powerline rights-of-way cross public land containing prairie dog towns. The amount of increase is unknown at this time.

If impacts could not be avoided, BLM would prepare a compensation plan for habitat replacement, as described in the sections on oil and gas and other minerals.

#### 8. Local Socio-economic Parameters

No Action: Under the existing situation, management of the black-footed ferret as an endangered species is not significantly impacting current social-economic conditions.

Proposed Action: The impacts of the Proposed Action on recreation, oil and gas and mineral resource development, livestock, and ranching were discussed previously. To the extent they could be identified and located, private landowners and State Land permittees were contacted, and it appears that the large majority of these individuals in the Management Area have indicated that they will not oppose the black-footed ferret reintroduction effort if it will not reduce the amount of control they have over their lands or conflict with their desired life style or income potential.

Some increase in visitor use of the Management Area is anticipated as black-footed ferrets are reintroduced. The level of this increase cannot be determined nor the degree to which the local economy would be positively affected.

Animal damage control activities would be conducted in a manner to avoid adverse impacts to black-footed ferrets.

In summary, the Proposed Action is unlikely to have a major impact on local socio-economic parameters in the area.

### V. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

#### A. Under the No Action Alternative:

None.

#### B. Under the Proposed Action Alternative:

Black-footed ferret mortalities would occur from the testing of experimental reintroduction procedures, natural environmental conditions, and incidental take while black-footed ferrets reestablish a free-ranging population in the Management Area.

Hopefully, a free-ranging breeding population of black-footed ferrets in the Management Area would be established. If so, the probability of the

black-footed ferret becoming extinct in the wild over the long term would be significantly reduced.

Oil and gas and mineral mining operations might have to use slightly more costly exploration and development techniques.

Trapping costs may increase to avoid ferret impacts.

Rights-of-way might have to be lengthened and/or rerouted on public lands to avoid black-footed ferret occupied active prairie dog towns. This could increase construction costs at an undetermined level.

Powerlines on public lands within prairie dog towns would be constructed using raptor deterrent devices which would increase the costs of construction.

The region would receive greater, but undetermined, revenues from the influx of State and Federal personnel periodically involved in the reintroduction program and from contracts with individuals involved in the black-footed ferret recovery effort. The region would also receive greater, but undetermined, revenues from the influx of tourists who wish to view black-footed ferrets.

Some or all of the increased costs to oil and gas operations, rights-of-way, powerlines, and other activities discussed above may be offset by the fact that no black-footed ferret surveys would be required in order to obtain permits within the Management Area.

C. Short-term vs. long-term productivity:

There would be no residual adverse impacts under the Proposed Action, and the short-term effects of the Proposed Action would not affect the long-term productivity of the area.

## VI. CONSULTATION AND COORDINATION WITH OTHERS

The Proposed Action was discussed with potentially affected State and Federal agencies in and near the reintroduction area. The Little Snake Black-Footed Ferret Working Group reviewed the proposed action and recommended that it be pursued. All significantly affected private land managers within the area were contacted. Public scoping meetings held in Colorado (Denver and Craig) in 1991 offered the general public the opportunity to review and comment on the reintroduction proposal. These publics were also informed that there would be more opportunity to review and comment on the Proposed Action--specifically, during the public comment period for the Little Snake RMP Amendment/EA and after publication of the proposed rulemaking to designate the reintroduced population as a nonessential experimental population.

Special presentations were made to several interest groups and committees including Craig District Multiple Use Advisory Council, Craig District Grazing Advisory Board, Craig District Coordinated Resource Management Steering Committee, and Moffat County Land Use Board.

The following is a list of individuals, organizations, and public agencies contacted as part of the public participation process related to planning for reintroduction:

### Individuals and Organizations

Colorado Cattlemen's Association  
 Colorado Farm Bureau  
 Colorado Wildlife Federation  
 Colorado Off-Highway Vehicle Coalition  
 Rocky Mountain Humane Society  
 Rocky Mountain Oil and Gas Association  
 Little Snake Motorcycle Club  
 Tooley Creepers 4-Wd Club  
 Brown's Park Sportsman Club  
 Prairie Dog Rescue, Inc.  
 Wexpro Company  
 Texaco, Inc.  
 BHP Petroleum (Americas), Inc.  
 Chandler and Associates, Inc.  
 Shefstead Bros.  
 Brannan Bros.  
 Lazy VD Land and Livestock  
 Maneotis Sheep Company  
 Nottingham Land and Livestock  
 Medicine Bow, Inc.  
 Raftopoulos Brothers  
 Smith Rancho, Inc.  
 Sombrero Ranches, Inc.  
 Visintainer Sheep Co.  
 Salisbury Livestock  
 Bogle Farms, Inc.  
 Carnahan Lands LTD  
 Todd Robertson  
 James Fitzgerald  
 Reed Kelley  
 Robert Arambel, Jr.  
 Tom and Donna Deakins  
 Stan Jolley  
 Monte Sheridan  
 Boyd Walker (deceased)  
 Charlie Brown  
 Mary Chivington Baker, ET AL  
 Edward Gutierrez  
 Robert E. and Dorothy Simpson  
 John Peroulis  
 James R. and Rebecca Menge  
 John Evans  
 Alicemae Bernice Morrie  
 Paul J. and Tracey L. Epley  
 Fred T. Blevins  
 Ann B. Willis (Estate)  
 Gary J. and Jessie L. Rowley  
 Georgia Simos Raftopoulos & CJC Properties  
 Ray L. Crawford  
 Carol L. Coon  
 Robert John Cutshaw  
 Gordon W. Flieger Et Al  
 Lynne E. and Theresa Mary Chase  
 Gordon M. Carper and Alice C. Hammer  
 Albert Ernest Innes

Charlotte Tourmaline Arnold  
Chester L. Solace, Jr.  
Rex Ross Walker  
Louis F. Livingston  
James R. and Claudette E. Fucci  
D. Doris Bickley  
Dale B. and Dorothy Deatherage

#### County Government

Moffat County Commissioners

#### State Government

Colorado State Land Board  
Colorado Division of Wildlife  
Wyoming Game and Fish Department

#### Federal Government

U.S. Department of Agriculture, APHIS  
National Park Service  
Bureau of Land Management (Wyoming)  
National Biological Survey

#### Elected Officials

United States Senator Hank Brown

### VII. LITERATURE CITED

- Jacquart, H., J. Flinders, M. Coffeen, and R. Hasenyager. 1986. Prescriptive transplanting and monitoring of Utah prairie dog (CYNOMYS PARVIDENS) populations. Brigham Young University and Utah Division of Wildlife Resources. Unpublished report. 70 pp.
- Little Snake Black-Footed Ferret Work Group. 1991. A cooperative management plan for black-footed ferrets--Little Snake Management Area, Colorado. U.S. Fish and Wildlife Service, Bureau of Land Management, and Colorado Division of Wildlife. 140 pp.
- Raptor Research Foundation, Inc. 1981. Suggested Practices for Raptor Protection on Powerlines. The State of the Art in 1981. Raptor Research Report No. 4. 111 pp.
- U.S. Bureau of Land Management. 1989. Little Snake Resource Management Plan and Record of Decision. Bureau of Land Management, Craig District, Craig, Colorado. 54 pp.
- U.S. Fish and Wildlife Service. 1988. Black-Footed Ferret Recovery Plan. U.S. Fish and Wildlife Service, Denver, Colorado. 154 pp.
- \_\_\_\_\_. 1989. Black-Footed Ferret Survey Guidelines for compliance with the Endangered Species Act. U.S. Fish and Wildlife Service, Denver, Colorado, and Albuquerque, New Mexico. 15 pp.



**DECISION RECORD  
AND  
FINDING OF NO SIGNIFICANT IMPACT**

**Decision:**

It is my decision to amend the Little Snake RMP by selecting the proposed action to reintroduce the black-footed ferret as a nonessential experimental population into the Little Snake Resource Area. This allows reintroduction of the black-footed ferret without significantly impacting other authorized uses of public land and contributes to BLM's goals in management of ecosystems and biodiversity.

Mitigation measures identified for the preferred alternative in the environmental consequences section have been formulated into special stipulations (Exhibit A) which are incorporated into this decision.

**Finding of No Significant Impacts:**

Based on the analysis of potential environmental impacts contained in the environmental assessment, I have determined that impacts are insignificant and an environmental impact statement is not needed.

**Rationale for Decision:**

My decision to implement the proposed action does not result in any undue or significant environmental impacts.

**The proposed action is:**

- to use experimental reintroduction techniques to establish a free ranging cooperatively managed wild population of black-footed ferrets in the Little Snake Black-Footed Ferret Management Area. This release would facilitate in achieving the goals of the national black-footed ferret recovery plan and assist in research of techniques for releasing ferrets.
- to participate in the national recovery effort for the endangered black-footed ferret, which entails establishing ten (10) or more wild populations throughout the species' historic range by 2010 in order to downlist the species to threatened status and;
- to amend the Little Snake Resource Management Plan (LSRMP) and add a management action that was not previously addressed. This document will amend the LSRMP by analyzing any impacts to affected resources from reintroduction of the black-footed ferret.

**Compliance and Monitoring:**

The attached compliance and monitoring plan (Exhibit B) has been developed for this project and is incorporated by reference into this decision.

**Reviewed By:**

*Diane A. Johnson* 8-1-95  
Planning and Environmental Coordinator Date

**Recommended By:**

*[Signature]* 8/1/95  
Area Manager Date

**Recommended By:**

*Robert W. Schneider* 8/3/95  
District Manager Date

**Approved By:**

*Robert Abbey* 8-9-95  
State Director Date

**Exhibit A****Special Stipulations**

1. **Class 3 cultural surveys will be conducted on the specific sites where surface disturbance will occur. If necessary, the surface disturbing activity will be relocated to a site in which surveys reveal no significant cultural/paleontological resources.**
2. **OHV use will be closed within 1/4 mile of release cages or release sites for 3 to 4 months during the release period.**
3. **A temporary closure to leghold and snare trapping will be required within a one mile radius of cage groups or release sites for 3 to 4 months during the release period. In all prairie dog towns within the Little Snake Black-Footed Ferret Management Area, tension adjustments will be required on leghold traps and stops will be required on snare traps until it is determined that trapping is no longer a threat to ferret survival.**
4. **Target shooting, plinking, or any type of sport hunting will be prohibited within 1/4 mile of release cages or release sites for 3 to 4 months during the release period.**
5. **New mineral material sales (sand and gravel) proposed in prairie dog towns within 1/4 mile of release sites may be required to delay or suspend operations for 3 to 4 months during the release period. Mineral material sales operations existing at the time of release site selection will not be restricted. Sales within the common use areas within 1/4 mile of release sites will also be suspended during the 3-4 month release period.**
6. **Rangeland improvement projects (fences, water developments, etc.) will not be allowed within 1/4 mile of release cages or release sites to prevent disturbance or damage during the 3 to 4 month release period.**
7. **Rights-of-way on public land that have the potential to disturb occupied black-footed ferret habitat will be rerouted to avoid those prairie dog towns.**
8. **Deterrent devices designed to prevent raptors from perching on power line structures will be required on all new construction to discourage predation on ferrets.**
9. **Compensation plans and plans of operation will be developed for oil and gas field development in the Little Snake Black-Footed Ferret Management Area. BLM would develop off-site mitigation plans for replacement of lost habitat, if necessary.**

**Exhibit B****Compliance and Monitoring****Compliance Schedule and Monitoring Plan**

Monitoring to ensure continued compliance throughout the life of the project will be an on-going effort throughout all phases of the reintroduction. Primary phases of reintroduction include (1) installation of release cages, (2) arrival of black-footed ferrets for pre-release conditioning, (3) release of ferrets from cages, (4) determination of initial movement and mortality, (5) determination of over wintering survival and mortality, and (6) determination of reproductive success. Phase 3 will continue for at least five years and phases 4, 5 and 6 will continue until the population is either established or the project is terminated because of failure or lack of funding.

**Assignment of Responsibility**

Compliance and monitoring will be the responsibility of the wildlife staff at the Little Snake Resource Area in cooperation with the appropriate offices of the Colorado Division of Wildlife and the U.S. Fish and Wildlife Service.